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September 5, 1984

RECEIVED

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**REGION I
OFFICE OF REGIONAL COUNSEL**

Charles C. Bering, Esq.
U.S. Environmental
Protection Agency
Region 1
J.F.K. Federal Building
Boston, MA 02203

Dear Mr. Bering:

This letter is written on behalf of AVX Corporation, Belleville Industries, Inc., Aerovox Incorporated, Cornell-Dublier Electronics, Inc. and Federal Pacific Electric Co., the defendants in the Superfund litigation pending in the United States District Court for the District of Massachusetts.

Upon reviewing the Draft Feasibility Study of Remedial Action Alternatives which was distributed recently by the EPA, it has become apparent to us all that we require time in addition to that allotted by the EPA to submit our comments on the Draft. As I understand it, the due date is now September 28. I hereby request on behalf of the above-named entities an extension of 120 days, or until January 26, 1985, within which to submit such comments.

The extension requested is not only warranted but is essential if we are to have a meaningful time within which to analyze the report, the underlying material on which it is based, and the alternatives considered. The difficulties presented by the brief time to respond are exacerbated by the fact that five alternatives are described in the Draft, each of which is said to have advantages and disadvantages. Beyond that, a representative of NUS recently stated that yet another alternative is being considered -- the so-called pineapple upside down cake alternative -- and will be the subject of a supplemental report. It obviously is inappropriate for the EPA expect comments by September 28 to

Charles C. Bering

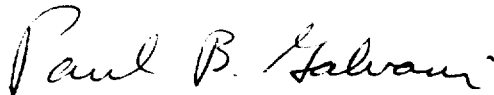
-2-

September 5, 1984

a document which took ten months to develop, which considers five complex options, and is not yet even complete.

Please let me hear from you promptly concerning this request for an extension. I hasten to point out that this request is not a waiver of any rights of the defendants, including their right to an adjudicatory hearing should the Government seek to try to assess any of these defendants for any response costs predicated on this report.

Very truly yours,

A handwritten signature in cursive script that reads "Paul B. Galvani".

Paul B. Galvani

PBG/jmm

cc: Ralph A. Child
Daniel J. Gleason
David A. McLaughlin
John Quarles
Lee Breckenridge
Jeffrey C. Bates